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T.R.A. DOCKET ROOM

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July 21, 2003

Tennessee Regulatory Authority ATTN: Sharla Dillon 460 James Robertson Parkway Nashville, TN 37238

Re:

Complaint of Ben Lomand Communications, Inc. against Citizens Communications Company of Tennessee, LLC d/b/a Frontier Communications of Tennessee; Docket No. 02-01221

Dear Ms. Dillon:

I am enclosing with this letter the original and fourteen (14) copies of a joint motion for adjustment of the schedule in the above-referenced matter. As you can see, both parties are in agreement on this motion.

Should you have any questions or require anything further at this time, please do not hesitate to contact me.

Sincerely,

H. LaDon Baltimore

Counsel for Ben Lomand Communications, Inc.

LDB/dcg Enclosures

CC:

Levoy Knowles

Guilford F. Thornton, Jr., Esq.

## BEFORE THE TENNESSEE REGULATORY AUTHORITY FIVED NASHVILLE, TENNESSEE

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IN RE:	TDA DODGO
COMPLAINT OF BEN LOMAND COMMUNICATIONS, INC.,	TR.A. DOCKET ROOM
Against	) ) DOCKET NO. 02-01221
CITIZENS COMMUNICATIONS COMPANY OF TENNESSEE LLC, d/b/a FRONTIER COMMUNICATIONS OF TENNESSEE.	) ) ) )

## JOINT MOTION TO ADJUST SCHEDULE

Ben Lomand Communications, Inc. files this motion jointly with Citizens

Telecommunications Company of Tennessee, LLC, d/b/a Frontier Communications of Tennessee, as evidenced by signatures of both parties below. By an Order Establishing Procedural Schedule dated June 24, 2003, the Authority established deadlines in this matter for the filing of discovery requests, discovery responses, direct testimony, and rebuttal testimony. The parties have exchanged discovery, with some discovery extended by mutual agreement to July 18, 2003 due, among other factors, to a hospital stay of one of the attorneys. Consequently, it will be impossible for the parties to prepare and file testimony by the deadlines now in place. Further, the parties anticipate procedural issues may arise, including potential discovery disputes. As a result, the parties propose an adjusted schedule that allows for the present hearing date, September 22, 2003, to remain and adequate time and for the parties and Authority staff to review all filings.

The following schedule is hereby proposed:

- Friday, July 18, 2003: Answers to second round of discovery and data requests
- Wednesday, August 27, 2003: Pre-filed Direct Testimony from both parties
- Monday, September 15, 2003: Pre-filed Rebuttal Testimony from both parties
- Monday, September 22, 2002: Hearing.

Respectfully submitted,

H. LaDon Baltimore, BPR #003836

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Counsel for Citizens Communications of

Tennessee, LLC d/b/a Frontier Communications

of Tennessee

## Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing has been forwarded via facsimile transmission, overnight delivery, or U. S. Mail, first class postage prepaid, to the following, this 21st day of July, 2003.

Guilford Thronton, Jr., Esq. Stokes Bartholomew Evans & Petree 424 Church Street, Suite 2800 Nashville, TN 37219

Randall William
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

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